

EXHIBIT B

****ROUGH DRAFT****

1 UNCERTIFIED TRANSCRIPT IN THE MATTER OF:

2 -----

3 WILLIAMS, ET AL.

4 VS.

5 BIG PICTURE LOANS, ET AL.

6 -----

7 GALLOWAY, ET AL.

8 VS.

9 BIG PICTURE LOANS, ET AL.

10 -----

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10 line numbers, punctuation and formatting.

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12 transcript contains no appearance page,
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15 THE VIDEOGRAPHER: We are now on
16 the record. This begins video one in the
17 deposition of Joette Pete in the matter of Lula
18 Williams, et al. versus Big Picture Loans, LLC.

19 Today is Tuesday, May 26, 2020.

20 The time is 10:12 a.m. This deposition being
21 taken remotely at the request of Armstrong
22 Teasdale. The videographer is Daniel Katz. The

17 A. I think he worked for Rosette. I'm not
18 sure.

19 Q. Okay. So you interacted with him in
20 his capacity as someone who worked for Rosette?

21 A. No.

22 Q. Did you not interact with him at all?

23 A. I just know the name.

24 Q. Just know the name. Okay.

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1 A. I can't remember.

2 Q. Okay. Do you know what the words
3 spoliation means?

4 A. Exfoliation?

5 Q. Not exfoliation. Spoliation,
6 s-p-o-l-i-a-t-i-o-n?

7 A. No. What does it mean?

8 Q. Do you have any personal knowledge
9 about how Red Rock stored its data?

10 A. No.

11 Q. Do you have any personal knowledge
12 about how Duck Creek stored its data?

13 A. No.

14 Q. Do you have any personal knowledge --
15 strike that.

16 Have you ever heard of a company called

17 SourcePoint?

18 A. Yes.

19 Q. What's SourcePoint?

20 A. SPVI.

21 Q. And what did it do?

22 A. I don't remember.

23 Q. Do you -- did you ever perform any

24 services for SourcePoint?

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1 A. No.

2 Q. Did you ever -- were you ever involved
3 in the day-to-day operations of SourcePoint?

4 A. Nope.

5 Q. Do you know -- do you have any personal
6 knowledge about how SourcePoint stores its data?

7 A. No.

8 Q. Have you ever heard of a company called
9 Bellicose?

10 A. Yes.

11 Q. What's Bellicose?

12 A. Matt Martorello's company.

13 Q. And what did it do? What did it do?

14 A. They originated the loans.

15 Q. How do you know that?

16 A. Because that's how it was set up.

17 Q. How do you know that Bellicose
18 originated the loans?

19 A. From the documents that I read.

20 Q. What documents did you read that said
21 that?

22 A. Documents that I provided to the FBI
23 and to you.

24 Q. Okay. And so whatever documents that

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1 say that Bellicose originated the loans you gave
2 to the FBI and to Mr. Cooperstein?

3 A. Yes. I gave everything.

4 Q. Are there any other documents that you
5 have which you contend show that Bellicose
6 originated the loans?

7 A. No.

8 Q. Okay. Do you have any personal
9 knowledge about how Bellicose stored its data?

10 A. No.

11 Q. Do you have any personal knowledge of
12 how Bellicose originated the loans?

13 A. No.